

EXHIBIT

A

EXHIBIT A



TO: KIM LUNDY- EMAIL
Walmart Inc.
GLOBAL GOVERNANCE/CENTRAL INTAKE, 2914 SE 1 STREET MS#0200
BENTONVILLE, AR 72712-3148

RE: **Process Served in Pennsylvania**

FOR: Wal-Mart Stores East, LP (Domestic State: DE)

**Service of Process
Transmittal**
04/22/2022
CT Log Number 541455274

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: COREN SANDEE and MICHAEL COREN, w/h // To: Wal-Mart Stores East, LP

DOCUMENT(S) SERVED: Attachment(s), Notice, Complaint

COURT/AGENCY: Philadelphia County - Court of Common Pleas, PA
Case # 220401350

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition - 07/24/2020 - 100 E. Street Road, Warminster, Pennsylvania 18974

ON WHOM PROCESS WAS SERVED: CT Corporation System, Harrisburg, PA

DATE AND HOUR OF SERVICE: By Process Server on 04/22/2022 at 13:04

JURISDICTION SERVED : Pennsylvania

APPEARANCE OR ANSWER DUE: Within 20 days after service

ATTORNEY(S) / SENDER(S): Michael J. Sternberg
Hoffman, Sternberg, Karpf & Lynch, LLC
737 Second Street Pike
Southampton, PA 18966
215-953-8955

ACTION ITEMS: CT has retained the current log, Retain Date: 04/23/2022, Expected Purge Date: 05/03/2022

Image SOP

REGISTERED AGENT ADDRESS: CT Corporation System
600 N. 2nd Street
Suite 401
Harrisburg, PA 17101
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



Service Intended for: WAL-MART STORES EAST, L.P.

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

		For Prothonotary Use Only (Docket Number)		
		APRIL 2022 E-Filing Number: 2204033000 001350		
PLAINTIFF'S NAME SANDEE COREN		DEFENDANT'S NAME WAL-MART STORES EAST, L.P., ALIAS: WAL-MART		
PLAINTIFF'S ADDRESS 9308 CENTENNIAL STATION DRIVE WARMINSTER PA 18974		DEFENDANT'S ADDRESS C/O CT CORPORATION 116 PINE STREET, SUITE 320 HARRISBURG PA 17101		
PLAINTIFF'S NAME MICHAEL COREN		DEFENDANT'S NAME WAL-MART STORES, INC., ALIAS: WAL-MART		
PLAINTIFF'S ADDRESS 9308 CENTENNIAL STATION DRIVE WARMINSTER PA 18974		DEFENDANT'S ADDRESS C/O CT CORPORATION 116 PINE STREET, SUITE 320 HARRISBURG PA 17101		
PLAINTIFF'S NAME		DEFENDANT'S NAME WAL-MART STORES EAST, INC., ALIAS: WAL-MART		
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS C/O CT CORPORATION 116 PINE STREET, SUITE 320 HARRISBURG PA 17101		
TOTAL NUMBER OF PLAINTIFFS 2		TOTAL NUMBER OF DEFENDANTS 3	COMMENCEMENT OF ACTION	
			<input checked="" type="checkbox"/> Complaint	<input type="checkbox"/> Petition Action
			<input type="checkbox"/> Writ of Summons	<input checked="" type="checkbox"/> Notice of Appeal
			<input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY	COURT PROGRAMS			
<input type="checkbox"/> \$50,000.00 or less	<input type="checkbox"/> Arbitration			
<input checked="" type="checkbox"/> More than \$50,000.00	<input checked="" type="checkbox"/> Jury			
	<input type="checkbox"/> Non-Jury			
	<input type="checkbox"/> Other:			
		Mass Tort	<input type="checkbox"/> Commerce	<input type="checkbox"/> Settlement
		Savings Actions	<input checked="" type="checkbox"/> Minor Court Appeal	<input type="checkbox"/> Minors
		Removal	<input type="checkbox"/> Statutory Appeals	<input type="checkbox"/> W/D/Survival
CASE TYPE AND CODE 2S - PREMISES LIABILITY SLIP/FALL				
STATUTORY BASIS FOR CAUSE OF ACTION				
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)				
FILED PRO PROTYPY APR 18 2022 S. RICE				
IS CASE SUBJECT TO COORDINATION ORDER? YES NO				
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>SANDEE COREN , MICHAEL COREN</u> Papers may be served at the address set forth below.				
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY MICHAEL J. STERNBERG		ADDRESS 737 SECOND STREET PIKE SOUTHAMPTON PA 18966		
PHONE NUMBER (215) 953-8955	FAX NUMBER (215) 953-9323			
SUPREME COURT IDENTIFICATION NO. 67332		E-MAIL ADDRESS msternberg@HSKLinjurylaw.com		
SIGNATURE OF FILING ATTORNEY OR PARTY MICHAEL STERNBERG		DATE SUBMITTED Monday, April 18, 2022, 01:43 pm		

MICHAEL J. STERNBERG, ESQUIRE
 HOFFMAN, STERNBERG, KARPF & LYNCH, LLC
 737 SECOND STREET PIKE
 SOUTHAMPTON, PA 18966
 (215) 953-8955
 IDENTIFICATION NO. 67332

SANDEE COREN and :
 MICHAEL COREN, w/h :
 9308 Centennial Station Drive :
 Warminster, PA 18974 :

vs. :

WAL-MART STORES, INC. :
 d/b/a WAL-MART :
 c/o CT Corporation :
 116 Pine Street - Suite 320 :
 Harrisburg PA 17101 :

and :

WAL-MART STORES EAST, INC. :
 d/b/a WAL-MART :
 c/o CT Corporation :
 116 Pine Street - Suite 320 :
 Harrisburg PA 17101 :

and :

WAL-MART STORES EAST, L.P. :
 d/b/a WAL-MART :
 c/o CT Corporation :
 116 Pine Street - Suite 320 :
 Harrisburg PA 17101 :

MAJOR CASE
 JURY TRIAL DEMANDED

Filed and Accepted by the
 Office of the Clerk of Court Records
 18 APR 2022 PM 12:43 pm

ATTORNEY FOR PLAINTIFF

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS
 TRIAL DIVISION

TERM, 2022

NO.:

NOTICE TO DEFEND

NOTICE

AVISO

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property of other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY

Le han demandado en corte. Si usted desea defender contra las demandas dispuestas en las páginas siguientes, usted debe tomar la acción en el plazo de veinte (20) días después de esta queja y se sirve el aviso, incorporando un aspecto escrito personalmente o y archivando en escribir con la corte sus defensas u objeciones a las demandas dispuestas contra usted el abogado le advierte que que si usted no puede hacer así que el caso puede proceder sin usted y un juicio se puede incorporar contra usted compra la corte sin aviso adicional para cualquier dinero demandado en la queja o para cualquier otra demanda o relevación pedida por el demandante. Usted puede perder el dinero o la característica de otra endereza importante a usted.

USTED DEBE LLEVAR ESTE PAPEL SU ABOGADO INMEDIATAMENTE. SI USTED NO HACE QUE UN ABOGADO VAYA A O LLAME POR TELÉFONO LA OFICINA DISPUESTA ABAJO. ESTA OFICINA PUEDE PROVER DE USTED LA INFORMACIÓN SOBRE EMPLEAR A UN ABOGADO. SI USTED NO PUEDE PERMITIRSE AL HIRE A UN ABOGADO, ESTA

Case ID: 220401350

<p>OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.</p> <p>LAWYER REFERENCE SERVICE One Reading Center 1101 Market Street Philadelphia, Pennsylvania 19107 (215) 238-6333</p>	<p>OPICINA PUEDE PODER PROVEER DE USTED LA INFORMACIÓN SOBRE LAS AGENCIAS QUE LOS SERVICIOS JURÍDICOS DE LA OFERTA DE MAYO A LAS PERSONAS ELEGIBLES EN UN HONORARIO REDUCIDO O NINGÚN HONORARIO</p> <p>SERVICIO DE REFERENCIA LEGAL One Reading Center 1101 Market Street Filadelfia, Pennsylvania 19107 Teléfono (215) 238-6333</p>
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MICHAEL J. STERNBERG, ESQUIRE
HOFFMAN, STERNBERG, KARPF & LYNCH, LLC
737 SECOND STREET PIKE
SOUTHAMPTON, PA 18966
(215) 953-8955
IDENTIFICATION NO. 67332

MAJOR CASE
JURY TRIAL DEMANDED

SANDEE COREN and
MICHAEL COREN, w/h
9308 Centennial Station Drive
Warminster, PA 18974

ATTORNEY FOR PLAINTIFFS

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
TRIAL DIVISION

vs.

TERM, 2022

WAL-MART STORES, INC.
d/b/a WAL-MART
c/o CT Corporation
116 Pine Street - Suite 320
Harrisburg PA 17101

NO.:

and

WAL-MART STORES EAST, INC.
d/b/a WAL-MART
c/o CT Corporation
116 Pine Street - Suite 320
Harrisburg PA 17101

and

WAL-MART STORES EAST, L.P.
d/b/a WAL-MART
c/o CT Corporation
116 Pine Street - Suite 320
Harrisburg PA 17101

CIVIL ACTION

1. Plaintiffs, SANDEE COREN and MICHAEL COREN, are individuals who currently reside at 9308 Centennial Station Drive, Warminster, Pennsylvania 18974.

2. Defendant, WAL-MART STORES, INC. d/b/a WAL-MART (hereinafter, "WAL-MART STORES, INC."), is a corporation authorized to conduct business within the Commonwealth of Pennsylvania, which regularly conducts business within the City and County of Philadelphia and maintains an address for service of process at c/o CT Corporation System, 116 Pine Street, Suite 320, Harrisburg, Pennsylvania 17101.

3. At all times material to this Civil Action, Defendant, WAL-MART STORES, INC., acted or failed to act as an agent, servant, workman and/or employee of Defendants, WAL-MART STORES EAST, INC. d/b/a WAL-MART (hereinafter "WAL-MART STORES EAST, INC.") and/or WAL-MART STORES EAST, L.P. d/b/a WAL-MART (hereinafter "WAL-MART STORES EAST, L.P."), which was then and there acting within the course and scope of its employment with said Defendants and in furtherance of the business of said Defendants.

4. In the alternative, at all times material to this Civil Action, Defendant, WAL-MART STORES, INC., acted or failed to act individually and/or through its agents, servants, workmen and/or employees who were then and there acting within the course and scope of their employment with said Defendant and in furtherance of the business of said Defendant.

5. Defendant, WAL-MART STORES EAST, INC., is a corporation authorized to conduct business within the Commonwealth of Pennsylvania, which regularly conducts business within the City and County of Philadelphia and maintains an address for service of process at c/o CT Corporation System, 116 Pine Street, Suite 320, Harrisburg, Pennsylvania 17101.

6. At all times material to this Civil Action, Defendant, WAL-MART STORES EAST, INC., acted or failed to act as an agent, servant, workman and/or employee of Defendants, WAL-MART STORES, INC. and/or WAL-MART STORES EAST, L.P., which was then and there acting within the course and scope of its employment with said Defendants and in furtherance of the business of said Defendants.

7. In the alternative, at all times material to this Civil Action, Defendant, WAL-MART STORES EAST, INC., acted or failed to act individually and/or through its agents, servants, workmen and/or employees who were then and there acting within the course and scope of their employment with said Defendant and in furtherance of the business of said Defendant.

8. Defendant, WAL-MART STORES EAST, L.P., is a limited partnership authorized to conduct business within the Commonwealth of Pennsylvania, which regularly conducts business within the City and County of Philadelphia and maintains an address for service of process at c/o CT Corporation System, 116 Pine Street, Suite 320, Harrisburg, Pennsylvania 17101.

9. At all times material to this Civil Action, Defendant, WAL-MART STORES EAST, L.P., acted or failed to act as an agent, servant, workman and/or employee of Defendants, WAL-MART STORES, INC. and/or WAL-MART STORES EAST, INC., which was then and there acting within the course and scope of its employment with said Defendants and in furtherance of the business of said Defendants.

10. In the alternative, at all times material to this Civil Action, Defendant, WAL-MART STORES EAST, L.P. acted or failed to act individually and/or through its agents, servants, workmen and/or employees who were then and there acting within the course and scope of their employment with said Defendant and in furtherance of the business of said Defendant.

11. Defendants, WAL-MART STORES, INC., WAL-MART STORES EAST, INC. and WAL-MART STORES EAST, L.P., shall be collectively referred to, hereinafter, as the "DEFENDANTS".

12. At all times material to this Civil Action, the DEFENDANTS owned, leased, operated, managed, maintained, possessed, controlled and/or had dominion over the property located at 100 E. Street Road, Warminster, Pennsylvania 18974 (hereinafter, the "PROPERTY"), more commonly known as "WAL-MART", a retail store (hereinafter, the "BUILDING"), which PROPERTY and BUILDING were open to the general public and business invitees such as the Plaintiff, SANDEE COREN.

13. On or about July 24, 2020 at approximately 12:30 p.m., Plaintiff, SANDEE COREN, was a customer and/or business invitee upon the PROPERTY and inside of the BUILDING and, while attempting to exit through the BUILDING's vestibule and out to the parking lot of the PROPERTY, was caused to sustain various injuries as a result of tripping due to the dangerous and defective condition that the DEFENDANTS created and/or permitted to exist, more specifically a raised, disfigured and/or bunched up rug, mat and/or runner on the floor located adjacent to the exterior doors.

14. Immediately after tripping on the aforementioned rug, mat and/or runner, Plaintiff, SANDEE COREN, fell forward and crashed to the ground.

15. As a direct result of the aforesaid incident and the injuries sustained therein, Plaintiff, SANDEE COREN, sustained severe and permanent internal and external injuries in and about her body and limbs, more specifically: left shoulder adhesive capsulitis with impingement and split tear of the long head of the biceps tendon requiring multiple cortisone injections; aggravation of left shoulder partial rotator cuff tear atrophy, biceps tenosynovitis and joint effusion confirmed by MRI; left thumb contusion and strain requiring multiple cortisone injections to the CMC joint; cervical sprain and strain requiring a cortisone injection; impacted left distal radius fracture requiring the use of a brace; second and third left rib fractures confirmed by x-ray; left elbow sprain and strain; right wrist sprain and strain; left knee sprain and strain; right knee sprain and strain and a severe and permanent shock to her nervous system, all of which have caused her and will continue to cause her great pain and agony, and will continue to prevent her in the future from attending to her daily duties and occupations, all to her great financial damage and loss.

16. As a direct result of the aforesaid accident and the injuries sustained therein, Plaintiff, SANDEE COREN, was forced to obtain medical treatment and incur various medical expenses which are ongoing and continuing.

17. As a direct result of the aforesaid accident and the injuries sustained therein, Plaintiff, SANDEE COREN, has and may suffer an impairment of her earning capacity and power.

COUNT I
SANDEE COREN v. DEFENDANTS
(Negligence)

18. The averments of paragraphs 1 through 17 are incorporated herein as though fully set forth at length.

19. At the time of the above referenced incident, the DEFENDANTS, acting as aforesaid, had negligently, carelessly, and/or recklessly allowed the PROPERTY and/or BUILDING to deteriorate so, that it was in an unsafe condition and imposed a danger to business invitees such as the Plaintiff. More specifically, said DEFENDANTS:

- A. Created a dangerous and defective condition which they knew or should have known about;
 - B. Allowed the dangerous and defective condition to exist which they knew or should have known about;
 - C. Failed to inspect the dangerous and defective condition which they knew or should have known about;
 - D. Failed to correct the dangerous and defective condition which they knew or should have known about;
 - E. Failed to warn Plaintiff of the aforesaid dangerous and defective condition which they knew or should have known about;
 - F. Failed to train its employees to avoid and/or prevent the aforesaid dangerous and defective condition which they knew or should have known about;
 - G. Failed to supervise its employees to inspect for, avoid and/or prevent the aforesaid dangerous and defective condition which they knew or should have known about;
 - H. Violated the pertinent provisions of the Statutes of the Commonwealth of Pennsylvania and local Municipal Ordinances;
 - I. Was otherwise negligent at law.
20. The above referenced unsafe condition of the PROPERTY and/or BUILDING, which was created and/or permitted to exist by the DEFENDANTS, was the proximate cause of the injuries which Plaintiff, SANDEE COREN, suffered on July 24, 2020.

WHEREFORE, Plaintiff, SANDEE COREN, demands judgment against the Defendants, WAL-MART STORES, INC., WAL-MART STORES EAST, INC. and/or WAL-MART STORES EAST, L.P., jointly and/or severally, in an amount in excess of Fifty Thousand Dollars, (\$50,000.00) plus interest and costs.

COUNT II
MICHAEL COREN v. DEFENDANTS
(Consortium)

21. Plaintiff, MICHAEL COREN, incorporates herein by reference the averments contained in paragraphs 1 through 20 inclusive, as fully as though the same were herein set forth at length.

22. Plaintiff, MICHAEL COREN, is the husband of Plaintiff, SANDEE COREN, and resides with her at 9308 Centennial Station Drive, Warminster, Pennsylvania 18974.

23. As a direct result of the DEFENDANTS carelessness and negligence as aforesaid, Plaintiff, MICHAEL COREN, was for a period of time deprived, may and probably will in the future be deprived of the society, assistance and support of his wife, SANDEE COREN, all of which has been and will continue to be to his great financial, physical, psychological and emotional damage and loss.

WHEREFORE, Plaintiff, MICHAEL COREN, demands judgment against the Defendants, WAL-MART STORES, INC., WAL-MART STORES EAST, INC. and/or WAL-MART STORES EAST, L.P., jointly and/or severally, in an amount in excess of Fifty Thousand Dollars, (\$50,000.00) plus interest and costs.

Respectfully submitted:



MICHAEL J. STERNBERG, ESQUIRE
Attorney for Plaintiffs

VERIFICATION

SANDEE COREN verifies that the statements made in this Pleading are true and correct. Verifier understands that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.


SANDEE COREN

Dated: 4/14/22